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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BETTY HARRIS, an individual; <i>et al.</i> ,)	
)	Case No. 2:15-cv-00984-RCJ-VCF
Plaintiffs,)	
)	
v.)	
)	
SECAF, DEBORAH LEE JAMES, Secretary)	
of U.S. AIR FORCE, <i>et al.</i> ,)	
)	
Defendants.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME
(Second Request)

Federal Defendants SECAF, Deborah Lee James, Secretary of the United States Air Force, Nellis Air Force Base, and Nellis AFB, Nevada ("Federal Defendants") respectfully request an extension of time to December 4, 2015, to answer or otherwise respond to Plaintiffs' Complaint (ECF No. 1).

In support of the instant Unopposed Motion, the Federal Defendants submit the following:

1. This Unopposed Motion is brought in order to accommodate the undersigned counsel for the Federal Defendants.
2. Plaintiffs' Complaint was filed May 28, 2015 (ECF #1).

3. The United States was served with the Summons and Complaint on June 1, 2015.

4. Plaintiffs filed a Notice of Intent to Take Default on August 19, 2015 (ECF No. 9).

5. On August 21, 2015, a Stipulation for Extension of Time was filed, allowing Federal Defendants until October 30, 2015, to file an answer. Plaintiffs also stipulated that they would voluntarily withdraw their Notice of Intent to Take Default. The Court granted the Stipulation on August 24, 2015.

6. The reason for this request is the United States has been unable to coordinate with agency counsel, including counsel who is currently on temporary duty in another state, for the necessary information and documentation needed in order to respond to Plaintiffs' Complaint.

7. On October 28, 2015, undersigned counsel for the Federal Defendants contacted Plaintiffs' counsel who agreed to the requested extension of time, and to the voluntary withdrawal of the Notice of Intent to Take Default (ECF No. 9).

8. The instant motion is filed in good faith and not for the purposes of delay.

WHEREFORE, for the above reasons, the Federal Defendants respectfully request the instant Unopposed Motion extending time to file an answer until December 4, 2015, be granted.

Respectfully submitted this 30th day of October 2015.

DANIEL G. BOGDEN
United States Attorney

/s/ Krystal J. Rosse
 KRYSTAL J. ROSSE
 Assistant United States Attorney
Attorneys for the United States

IT IS SO ORDERED:

~~UNITED STATES DISTRICT JUDGE~~
UNITED STATES MAGISTRATE JUDGE

DATED: November 2, 2015

CERTIFICATE OF SERVICE

I, Krystal J. Rosse, AUSA, certify that the following individual was served with the
UNOPPOSED MOTION FOR EXTENSION OF TIME on this date by the below identified method
of service:

Electronic Case Filing:

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DATED this 30th day of October 2015.

/s/ Krystal J. Rosse
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